

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

CHRISTINE ALBERTO,

Plaintiff,

-against-

MICHAEL MORALES OF THE NEW YORK CITY POLICE  
DEPARTMENT; WILLIAM PERRY OF THE NEW YORK  
CITY POLICE DEPARTMENT; OFFICERS JOHN DOE OF  
THE NEW YORK CITY POLICE DEPARTMENT; NEW  
YORK CITY POLICE COMMISSIONER, WILLIAM J.  
BRATTON; FIONNUALA O'DOHERTY, ASSISTANT  
DISTRICT ATTORNEY OF THE NEW YORK COUNTY  
DISTRICT ATTORNEY'S OFFICE; MIREILLE DEE,  
ASSISTANT DISTRICT ATTORNEY OF THE NEW YORK  
COUNTY DISTRICT ATTORNEY'S OFFICE; CYRUS R.  
VANCE, JR., DISTRICT ATTORNEY OF THE NEW YORK  
COUNTY DISTRICT ATTORNEY'S OFFICE; THE NEW  
YORK COUNTY DISTRICT ATTORNEY'S OFFICE; AND  
THE CITY OF NEW YORK

Defendants.

X

Civil Action No.  
1:15-cv-09449-AJN

**Rule 26 Disclosures**

ECF Case

Plaintiff Christine Alberto, by and through her attorney-of-record, Montell Figgins, Esq., file this Initial Disclosure to Defendant pursuant to Rule 26 of the Federal Rules of Civil Procedure. This disclosure may not be complete. As soon as any other information requires to be disclosed is discovered, Plaintiff will forward it.

**(1) INITIAL DISCLOSURES**

(A) The name and, if known, the address and telephone number of each individual likely to have information that bears significantly on any claim or defense, identifying the subjects of the information, and a brief, fair summary of the substance of the information known by the person:

1. Damerkys Alberto  
5 Edgewood Ave.  
Cumberland, Rhode Island 02864  
(401) 365-9461

**Ms. Damerkys Alberto personally witnessed Ms. Christine Alberto's false imprisonment.**

2. Crystal Alberto  
5 Edgewood Ave.  
Cumberland, Rhode Island 02864

(401) 617-8858

**Ms. Crystal Alberto has personal knowledge of the medical conditions Ms. Christine Alberto has suffered due to the events listed in the Complaint.**

3. Jonathan Castillo  
205 Manton Ave.  
Providence, Rhode Island 02909  
(401) 654-7032

**Mr. Jonathan Castillo has personal knowledge of the medical conditions Ms. Christine Alberto has suffered due to the events listed in the Complaint.**

4. Anna Rodriguez  
8 Grant Ave.  
Lincoln, Rhode Island 02865  
(401) 917-9872

**Ms. Alberto's aunt who personally observed the actions of the Defendants in Rhode Island.**

5. Luis Rodriguez  
8 Grant Ave.  
Lincoln, Rhode Island 02865  
(401) 917-9872

**Ms. Alberto's uncle who has personal knowledge of the events alleged in the Complaint.**

6. Jalibel Martinez  
8 Grant Ave.  
Lincoln, Rhode Island 02865  
(401) 917-9872

**Ms. Alberto's cousin who was harassed by Defendants and has personal knowledge of the events alleged in the Complaint.**

7. Astry Martinez  
8 Grant Ave.  
Lincoln, Rhode Island 02865  
(401) 917-9872

**Ms. Alberto's cousin who was harassed by Defendants and has personal knowledge of the events alleged in the Complaint.**

8. Pomas Alberto  
178 Avenue D, Apt. 5H  
New York, New York 10009  
(347) 303-9722

**Ms. Alberto's father who was harassed by Defendants at his residence.**

9. William Divine  
536 Atwells Avenue  
Providence, Rhode Island 02909  
(401) 454-1212

**Rhode Island attorney who assisted Ms. Alberto in Rhode Island during the events that took place in Rhode Island alleged in the Complaint. Has personal knowledge of Defendants' actions that took place in Rhode Island.**

10. Maria Alberto 347--  
178 Avenue D, Apt. 5H  
New York, New York 10009  
(347) 938-8904

**Ms. Alberto's stepmother who was harassed by Defendant police officers and threatened to be deported with children as alleged in the Complaint.**

11. Lisa Mota  
138 Thurbers Avenue  
Providence, Rhode Island 02909  
401-999-4045

**Ms. Alberto's co-worker and friend who has observed Ms. Alberto's changed behavior due to the alleged events.**

12. Naiommi Baret  
139 Metropolitan Avenue  
Providence, Rhode Island  
(401) 225-0035

**Ms. Alberto's friend who has observed Ms. Alberto's psychological trauma as alleged in the Complaint including paranoia and debilitating fear.**

13. Lance Fletcher  
225 Broadway, Suite 2700  
New York, New York 10007  
(212) 619-3900

**Ms. Alberto's former attorney who personally observed the actions of Defendants on November 10 as alleged Complaint.**

- (B) A copy of all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party likely to bear any significance on any claim or defense:

**None at this time.**

- (C) A computation of any category damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

**As a result of Defendants' egregious conduct, Plaintiff has suffered economic losses, harm to career, false imprisonment, malicious prosecution, physical pain and suffering, severe emotional distress, and other such damages compensable under New York and/or Federal Law.**

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

**Plaintiff has no information regarding this category.**

**(2) DISCLOSURE OF EXPERT TESTIMONY**

- (A) The identity of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence.

1. Dr. Manoj Garg  
1445 Wampanoag Trail  
East Providence, Rhode Island 02915  
(401) 475-4588

**Dr. Garg is Ms. Alberto's physician who has observed and treated Ms. Alberto for the medical conditions she has suffered due to the events listed in the Complaint.**

2. Eliseo Nogueras  
38 Park St.  
Pawtucket, RI 02860

**Provides Ms. Alberto psychological therapy due to the injury she sustained from the alleged events.**

**(3) PRETRIAL DISCLOSURE**

- (A) The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises:

**See (1)(A) and (2) above.**

- (B) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony:

**None at this time.**

- (C) An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

**See (1)(B) above.**

Dated: March 16, 2016

BY: /s/ Montell Figgins  
Montell Figgins, Esq.  
The Law Offices of Montell Figgins  
17 Academy St., Suite 601  
Newark, NJ 07102  
(973) 242-4700 (t)  
(973) 242-4701 (f)

TO: Cherie N. Brown  
Assistant Corporation Counsel  
Special Federal Litigation Division  
Office of the Corporation Counsel  
Attorney for the Defendant  
100 Church Street  
New York, NY 10007

Susan C. Roque  
New York County District Attorney's Office  
One Hogan Place  
New York, NY 10013  
(212)-335-9209